

# Holland & Knight

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August 5, 2025

Honorable Sidney H. Stein  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY

**Re: 25-cv-5904, Pennantia, LLC v. Rose Cay Maritime, LLC and Dove Cay, LLC**  
**Withdrawal of Request for Order Directing Production of Purported Subcontract**  
**Agreement**

Your Honor,

We represent Plaintiff Pennantia, LLC (“Pennantia”) in the referenced matter and write to report that counsel for Dove Cay, LLC (“DC”) has forwarded to us a copy of the “Crew and Technical Management Agreement” dated April 14, 2022 (the “CTMA”) that accompanied the Panamanian complaint.

While DC’s counsel has not sent to us documents that are related to the CTMA – such as any correspondence between DC and RCM regarding the negotiation, creation, and execution of the CTMA – and has not provided the CTMA in a manner such that it might be forensically examined, for purposes of Pennantia’s briefing due this Friday Pennantia withdraws its motion for production from earlier today. We have requested DC’s counsel to instruct their client to preserve these classes of documents for future discovery.

As mentioned in its letter to the Court earlier today, Pennantia reserves its right to pursue forensic examination of the foregoing classes of documents as this proceeding progresses if it appears that such an issue is relevant.

We thank Your Honor for his attention to this matter.

Respectfully submitted,

HOLLAND & KNIGHT LLP

*s/ Michael J. Frevola*  
Michael Frevola